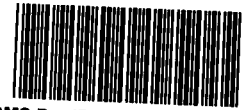


Elkton RAC/INPR REQ. 05-05

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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SDMS DocID

2209972

May 4, 2005

Susan Platt
Attorney
U.S. Army Corps of Engineers, Baltimore District
10 S. Howard St.
Baltimore, MD 21203-1715

Re: **Elkton Farms Firehole Site**

Dear Susan:

This letter follows up on our previous conversations and E-mail traffic regarding the so-called Elkton Farms Firehole Site ("Site"). I understand that, at least at this time, the Corps takes the position that any munitions residue that may be found at the Site is not eligible for a DERP funded cleanup, because Triumph Industries (and perhaps others) controlled the Site during munitions production during times other than the four month period bridging 1942 and 1943 when the U.S. operated the plant pursuant to Presidential Executive Order. EPA is further reviewing the Corps' position on this point, and by separate letter will be requesting copies of related documentation.

In the meantime, as we discussed, EPA appreciates the Corps' willingness to continue to assist EPA with information it has developed to date, as we move forward on assessing whether the Site poses an unacceptable risk to human health and the environment. To that end, enclosed is a CERCLA 104(e) request which seeks copies of the following documents:

- Any documentation regarding the May 5, 2004 Site visit by George Follet and John Wilken of the Corps, including any observations or conclusions they may have made regarding how best to address the Site. The Corps has already provided EPA a copy of the June 6, 2004 "Resume of Staff Visit," and EPA would like to review any additional technical report or other documentation that could help us determine precisely where to conduct further assessment and other response operations.

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- The Corps' Risk Assessment Code score for the Site, as well as any relevant documentation regarding its calculation.
- Table 2 of the Army's PRP report, p. 45a, lists two areas which appear to be located near where we think the firehole(s) were located. "Martin Herron" is listed as one of "Potential sources with Documented Solvents or TCE Usage/Disposal," located at Site No. S2, w/ no information for dates of usage. Please provide the documentation or other information supporting this finding.
- Also listed on Table 2 of the Army's PRP report, p. 45a, as one of "potential sources with Possible Solvents or TCE Usage/Disposal," is the "Triumph Explosives Firehole," located at Site No. S19, w/ dates of "1933? - 1946". Please provide the documentation or other information supporting this finding.
- Any other documentation regarding present (i.e. within the past five years) conditions at the Site.

Finally, in a January 14, 2005 E-Mail to EPA, the Vaselike Karanikolis of the Corps reported that the Corps' draft Inventory Project Report ("INPR") was undergoing final review, and that the Corps expected to be able to provide a copy of the draft INPR to EPA within approximately four weeks. As you know, Section 3-1.1.2 of the Corps' FUDS Program Policy requires coordination with EPA and solicitation of our input. Please provide the present status of the Corps' review of the draft INPR, and when EPA may expect to receive a copy for review.

As we discussed, EPA is concerned about the present Site conditions, based in part on the Corps' own observations made at the Site nearly a year ago, and wants to move forward quickly. EPA plans to conduct an EM-61 field survey of the Site next week, and will thereafter decide the next steps to take.

Thank you in advance for your assistance in this matter, and please call me if you have any further questions.

Sincerely yours,

Charles B. Howland
Sr. Asst. Regional Counsel